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January 20, 2006

Mr. Stephen Johnson, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building, 1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Comments on the HPV Test Plan for Antimony dipentyldithiocarbamate

Dear Administrator Johnson:

The following comments on Vanderbilt's test plan for the chemical Antimony dipentyldithiocarbamate are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

R.T. Vanderbilt Company, Inc. submitted its test plan on September 20, 2005, for the chemical Antimony dipentyldithiocarbamate (CAS No. 15890-25-2), referred to by its trade name, Vanlube 73. This chemical is used as an extreme pressure and anti-wear lubricant and grease additive. Vanderbilt has submitted a test plan that is very brief and lacks significant detail. While we agree with the sponsor's proposal to conduct a chronic daphnia test to address the potential ecotoxicity of Vanlube 73, based on the low water solubility and high partition coefficient of this material, we strongly disagree with Vanderbilt's proposal to conduct a combined repeated dose/reproductive/developmental toxicity study (OECD 422). If conducted, this test will cause the suffering and deaths of at least 675 animals.

We are concerned that little attempt has been made to bridge the data gaps for mammalian health endpoints with existing data from similar or analogous chemicals. While there may not be data on Vanlube 73 *per se* with regard to potential chronic, reproductive, and developmental toxicity, there is no discussion of how this chemical is related to another Vanderbilt HPV chemical, Vanlube 7723 (CAS No. 10254-57-6). Although the structures of the two chemicals are not as similar as might be considered necessary for a routine "read-across" approach, an examination of the existing toxicity profiles of both chemicals reveals many similarities. Both chemicals are used as petroleum lubricant additives, have similar physical/chemical properties, and have almost identical, and extremely high, LD50 values. Furthermore, a combined repeated dose/reproductive/developmental toxicity study was conducted with Vanlube 7723 in 2004. Data from this study showed no evidence of toxicity to pups at doses as high as

20,000 ppm. These data, when considered together, suggest similar results would be obtained for Vanlube 73. We urge Vanderbilt to review this study and to further explore and develop this relationship to Vanlube 7723 in order to avoid separate and/or duplicative testing for mammalian toxicity endpoints. In light of the expected low human exposure combined with the low anticipated toxicity, additional animal testing is particularly disturbing in this case.

This approach would not only save the lives of many animals but would also demonstrate a thoughtful analysis of the likely toxicity of Vanlube 73 based on existing data from analogous chemicals. Without this analysis, it is premature to conduct further, unreliable animal tests, which would kill many animals and only serve as a "check-the-box" exercise. This is consistent with the animal reduction measures set forth by the EPA in the *Federal Register* (December 2000), which states that HPV participants "may conclude that there is sufficient data, given the totality of what is known about a chemical, including human experience, that certain endpoints need not be tested."

We are hopeful that Vanderbilt will examine all existing data before deciding to conduct a separate repeated dose/reproductive/developmental toxicity test on Vanlube 73. Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 327, or via e-mail at *meven@pcrm.org*.

Sincerely,

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Research Analyst

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